

Limited English Proficiency Plans and Incorporating LEP into the Airport Emergency Plan



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*ACHIEVING SAFETY
THROUGH DIVERSITY*

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Agenda

- Regulations
- Definitions
- Four Factor Analysis
- Five Minimum Elements of a LEP Plan
- Creating a LEP Plan
- Incorporating LEP into an Airport Emergency Plan

Regulations

- **Executive Order 13166** “Improving Access to Services for Persons with Limited English Proficiency” dated August 11, 2000
- **U.S. Department of Transportation** issued LEP guidance for recipients in December 2005 found in **Federal Register, Volume 70, No. 239**, “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons”

Definitions

- **LEP Individual** – a person who does not speak English as their primary language and has a limited ability to read, write, speak or understand English
- **Interpretation** – the act of listening to something in one language (source language) and orally translating it into another language (target language)
- **Translation** – the replacement of written text from one language (source language) into an equivalent written text in another language (target language)

Definitions (continued)

- **Language Assistance Services** – oral and written language services needed to assist LEP persons to communicate effectively with staff, and to provide LEP persons with meaningful access to airport sponsor programs or activities
- **Meaningful Access** – language assistance that results in accurate, timely and effective communication at no cost to the LEP person

Four-Factor Analysis

Airport sponsors should apply these four factors to determine the extent of their obligation to provide LEP services:

1. Number/proportion of LEP persons in an airport sponsor's area
2. Frequency of contact between LEP persons and the airport sponsor's services
3. Importance of the service provided by the airport sponsor
4. Resources available to the airport sponsor and costs

Five Minimum Elements of a LEP Plan

An effective LEP Plan for LEP persons should include, at a minimum the following elements

1. Identification of LEP persons
2. Language assistance measures
3. Training staff
4. Provide notices to LEP persons
5. Monitoring and updating the LEP Plan

Creating a LEP Plan

Four-factor analysis

- Conduct a four-factor analysis

OR

- If you are aware that a four-factor analysis has been done, find a copy of the most recent and review the results

Creating a LEP Plan (continued)

Pull pertinent data from the four-factor analysis

- For example:
 - LEP population demographics
 - Frequency of contact with LEP persons
 - Importance of services, information, program or activity
 - Costs versus resources and benefits

Incorporate data into the first element of the LEP Plan

- Identification of LEP persons

Creating a LEP Plan (continued)

Identify the LEP assistance to provide

- Types of assistance and source
- Procedures for providing assistance
- Points of contact

Incorporate data into the second element of the LEP Plan

- Language assistance measures

Creating a LEP Plan (continued)

Identify what to do with the LEP Plan

- Distribute
- Training
- Notify

Incorporate data into the third and fourth elements of the LEP Plan

- Training staff
- Provide notices to LEP persons

Creating a LEP Plan (continued)

Determine if LEP Plan is current and still appropriate to meet language assistance needs

- Periodically review
- Seek feedback from local community
- Check with airport staff
- Ensure identified sources are still available and viable
- Four-factor analysis

Incorporate data into the fifth element of the LEP Plan

- Monitoring and updating the LEP Plan

Incorporating LEP into the Airport Emergency Plan

FAA Advisory Circular 150/5200-31C (Emergency Plan) indicates that in the following sections, LEP individuals should be included based on:

- **Chapter 6, Functional Sections:**

- Section 3: Alert Notification and Warning
- Section 4: Emergency Public Information
- Section 5: Protective Actions (not specified as clearly in this section, but LEP individuals should be identified with populations groups requiring special assistance and/or special needs populations)

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